

No. 04-19-00192-CR
No. 04-19-00193-CR

STATE OF TEXAS

§ **IN THE COURT OF APPEALS**
4th COURT OF APPEALS
SAN ANTONIO, TEXAS

VS.

§ **FOURTH JUDICIAL DISTRICT**
6/18/2019 5:01:52 PM
KENTH E. HOTTELL
CLERK

JOHNNY JOE AVALOS

§ **BEXAR COUNTY, TEXAS**

UNOPPOSED MOTION TO CONSOLIDATE APPEALS

From the 437th District Court of Bexar County, Texas
Trial Court No. 2018-CR-7068
Hon. Lorie Valenzuela, Judge Presiding

The Appellant hereby submits his unopposed motion to consolidate appeals, under authority of Tex. R. App. Pro. 47.1, and in support thereof shows:

Mr. Avalos' convictions were the product of a plea to indictments in Cause Nos. 2018-CR-7068 and 2016CR10374. The Court found Mr. Avalos guilty of both offenses, and received life sentences without parole that ran concurrent to each other. All arguments relevant to his appeal will apply identically to both cases. Mr. Avalos requests that his two cause numbers be consolidated into one appeal, with one cause number. *See Broussard v. State*, Nos. 13-12-00092-CR, 13-12-00093-CR, 2012 Tex. App. LEXIS 7148 (Ct. App. Corpus Christi - 2012) (unpublished) (granting appellant's motion to consolidate appeals because the trial court held a single hearing on motions to revoke community supervision) (citing Tex. R. App. P. 47.1)).

On June 18, 2019, the undersigned spoke with Ms. Mary Beth Welsh, Chief of the Bexar County District Attorney's Office Appellate Section, who is unopposed to the requested motion to consolidate.

WHEREFORE, Appellant respectfully requests that this Court grant the requested consolidation motion.

Respectfully submitted,

Jorge G. Aristotelidis
Tower Life Building
310 South St. Mary's Street, Suite 1910
San Antonio, Texas 78205
210/277-1906
jgaristo67@gmail.com

By: /s/ JORGE G. ARISTOTELIDIS
SBN: 00783557

CERTIFICATE OF SERVICE

I hereby certify that on this the 18th day of June, 2019 a copy of the foregoing “Unopposed Motion to Consolidate Appeals,” has been delivered to the Appellate Section of the Bexar County District Attorney’s Office, *via* the Texas Efile system.

/s/ JORGE G. ARISTOTELIDIS